

AFFIDAVIT

I, Nicholas Horine, a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), do hereby state under oath that I make this Affidavit in support of an application for a search warrant authorizing the search of the person of Joseph Rob ISAAC (DOB: 01/17/1998) to obtain a DNA sample by way of buccal swabs.

1. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7) and empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. I have been a Task Force Officer with the ATF since October 2022, and I am currently assigned to the Kansas City, Missouri office. I am also a Detective with the Kansas City, Missouri Police Department and have been a sworn law enforcement officer since 2012. During my time in law enforcement, I have received specialized training in numerous areas, to include illegal firearms possession and drug trafficking. I have participated in several major criminal investigations involving federal firearms offenses.

3. This Affidavit contains information necessary to support probable cause for the application. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is based on my personal knowledge and observations, information conveyed to me by other law enforcement officials, information discovered through a credible anonymous tip, and my review of reports prepared by law enforcement officials.

PLACE TO BE SEARCHED AND EVIDENCE TO BE SEIZED

4. This Affidavit is in support of a search warrant for the person of Joseph Rob ISAAC (DOB: 01/17/1998), specifically authorizing investigators to obtain swabs of ISAAC’s saliva via

buccal swabs in the normally accepted forensic manner, in order to obtain ISAAC's DNA for comparison to items of evidence collected in an on-going federal investigation.

OFFENSES UNDER INVESTIGATION

5. Based upon my training and experience, and on the facts set forth in this Affidavit, there is probable cause to believe Joseph Rob ISAAC (a/k/a "Sleazyworld Go") has committed violations of Title 18, United States Code, Section 922(g)(1), that is felon in possession of a firearm and ammunition, and Title 26, United States Code, Section 5861(d), unlawful receipt or possession of a firearm (machinegun) which is not registered to them in the National Firearms Registration and Transfer Record (hereinafter "**Target Offenses**").

PROBABLE CAUSE

6. On July 12, 2016, ISAAC was convicted of Armed Robbery in Kent County, Michigan Circuit Court, Case Number 15-10577-FC. For that offense, ISAAC was sentenced to a minimum of four years and maximum of twenty years in the Michigan Department of Corrections. Although ISAAC, born in 1998, was under the age of 18 when the robbery offense was committed, he was charged and sentenced as an adult. On September 19, 2021, ISAAC was discharged from the supervision of the Michigan Department of Corrections. Under federal law, ISAAC has been prohibited from possessing firearms or ammunition for his entire adult life.

7. ISAAC (a/k/a "Sleazyworld Go"; "Sleazy") is a local Kansas City, Missouri rap artist who has achieved moderate national success since being released from prison in Michigan in 2020. ISAAC is a documented member of the street gang Brotherland Gang (BLG) which is linked to multiple violent crimes within the Kansas City, Missouri area. Multiple members of this street gang are also aspiring rap artists of lesser renown. Some of those members incorporate

“Sleazyworld,” “BLG,” “BL,” “Sleazyland,” or combinations of the two (Sleazyworld and Brotherland) into their social media profiles and rapping monikers.

8. On July 18, 2022, the Kansas City ATF Field Division received an anonymous tip from an individual who had recent personal contact with ISAAC. In this tip, two photographs were provided. In the first photo, ISAAC is posing with the Glock type pistol partially in front of his face. A black Glock full auto “Switch” can be observed affixed to the rear of the pistol slide.



9. In the second photo, a Glock type pistol is observed sitting on a table behind a stack of United States currency. A black Glock full auto “Switch” can be observed affixed to the rear of the pistol slide.



10. Investigators know a Glock Full-Auto Conversion “Switch” is a device that is affixed to the rear of a Glock pistol slide. They are visibly identified as a small metallic cube with a round pin that is manipulable from side to side which allows the shooter to select between semi-automatic and fully automatic fire. This device, whether affixed or unaffixed to a pistol, is considered a machinegun under federal law. While other accessories are marketed that replace the rear plate of a Glock pistol slide, only the aforementioned “Full-Auto Switches” are the distinctive cube shape with a round pin bisecting the two sides. All other known replacements are merely flat cosmetic replacements, or larger handles utilized to create a grip to retract the slide to lock it back and/or cycle the slide to chamber the firearm with ammunition.



11. Under Title 26, United States Code, Section 5845(b), a “machinegun” is defined as “. . . any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.”

Isaac's Residence

12. Throughout the course of the investigation, investigators have conducted extensive surveillance on ISAAC. Through that surveillance, it was determined ISAAC lives at 6809 Prairie Lane, Parkville, Missouri. Investigators have also utilized a pole camera, or stationary surveillance device, to confirm that address is utilized by ISAAC as his primary residence.

13. ISAAC has been consistently observed at the residence when he is not touring for musical performances. ISAAC's live-in girlfriend or significant other, Tamerica Lewis, has been regularly observed at the residence and utilized the address on her newly acquired Missouri driver's license. Ms. Lewis is also on the lease at a townhome located at 340 North Coy Street, Kansas City, Kansas. Investigators have also conducted trash pulls at the residence that revealed items in the name of ISAAC, Ms. Lewis, and ISAAC's mother, Pearl Isaac.

14. On October 19, 2022, officers with the Parkville, Missouri Police Department were dispatched to the residence at 6809 Prairie Lane, Parkville, Missouri in regard to a domestic dispute between ISAAC and Ms. Lewis. In that incident, ISAAC reported that Ms. Lewis had assaulted him after going through his cellular telephone and discovering he was speaking with other women.

15. ISAAC was last observed by investigators at the residence in the early morning hours of January 23, 2023.

Isaac's Social Media Presence

16. To promote himself and his music, ISAAC has created a near constant social image of himself and other gang members in possession of Glock pistols, extended magazines, and full-auto Glock "switches." The firearms ISAAC poses with are easily discernable as actual firearms and not merely prop weapons, BB, or Airsoft guns. In many photos, live rounds of ammunition

can be seen in magazines inserted into these firearms. Additionally, many firearms depicted in the photos have visible muzzle bores far larger than the .177 inch bore of a standard BB gun, or .237 inch bore of an airsoft gun.

17. On October 7, 2022, federal search warrants were executed on the Facebook (22-SW-00635-JAM) and Instagram (22-SW-00636-JAM) accounts of ISAAC. The content reviewed from the accounts includes multiple drug transactions, both buying and selling; the purchase and possession of multiple firearms; and the purchase and possession of multiple full-auto machinegun conversion devices, or “Switches.” The content from those accounts also included multiple photos and videos depicting ISAAC in possession of up to twenty-one firearms at a time. On October 19, 2022, investigators recovered two AK-47 style “Draco” pistols and Glock machinegun pistol from ISAAC’s vehicle. From the social media photos, investigators believe ISAAC also owns an AR-15 type pistol with red hardware affixed to it; an AK-47 pistol with dark brown wood grain grips; a Glock, Model 23, Gen 4 pistol; and multiple other firearms. These firearms appear in multiple photos posted between September 2020 and September 2022.

18. Throughout the history of ISAAC’s social media accounts, he has posted several photos of himself wearing apparel promoting Glock, Inc. pistols and Glock, Inc. “Switches.” ISAAC has posted photos of himself wearing shirts with the make and model of at least two of his firearms – a Glock, Model 27, Gen 4, semi-automatic firearm which was recovered by investigators in October 2022, and a Glock, Model 23, Gen 4, semi-automatic firearms which has

not been recovered. ISAAC posted photos with the firearms that matched the description found on his t-shirt.



19. On March 26, 2021, on his Facebook Account, “SleazyyWorld Go (Sleaz)”, ISAAC posted photos of himself sitting on stairs with a black Glock sitting on the stair below him.



20. May 22, 2021, ISAAC posted a photo of himself posing with two Glock type pistols with extended magazines on the floor in front of him to his Facebook Account.



21. On July 26, 2021, ISAAC posted a photo to his Facebook Account depicting him with two Glock type pistols with extended magazines aimed at the camera. Through the barrel of one of the pistols, a round of polished brass hollow point ammunition is visible, chambered within the firearm.



22. On October 7, 2021, ISAAC posted a photo to his Facebook Account depicting him posing with two Glock type pistols each with drum magazines inserted into them. One of the drum magazines is made of transparent plastic and multiple rounds of ammunition are visible within it.



23. On December 4, 2021, ISAAC posted multiple photos to his Facebook Account depicting him posing in a convenience store while holding a Glock, Model 27, .40 caliber pistol with an extended magazine while wearing a purple t-shirt with the print, “GLOCK Gen 4 27.”



24. On January 15, 2022, ISAAC posted a series of photos of himself posing while holding a black framed Glock type pistol with a gold slide and barrel tip in his left hand, and a tan colored Glock type pistol in his right hand between his legs. There are eight additional pistols visible on a cabinet behind ISAAC. These photos were posted to his Facebook Account.



25. One of the pistols appears to be inserted into a “Carbine Conversion Kit” type apparatus that allows the pistol to be more easily fired with either two hand support or shoulder support for increased accuracy and control. Also visible, affixed to the rear of the pistol’s slide, is a Glock Full-Auto “Switch” converting this firearm to be capable of firing fully automatic.



26. On March 24, 2022, ISAAC posted a photo of himself to his Facebook Account depicting him holding a Glock type pistol with a holographic slide. A second Glock type pistol is visible on the counter in front of him with a drum ammunition magazine inserted into it.



27. April 14, 2022, on his Instagram Account, “sleazyworld_go”, ISAAC posted a series of photos of himself holding a black and red AR-15 style pistol with an extended ammunition magazine.



28. On April 16, 2022, ISAAC posted a photo of himself to his Instagram Account depicting him seated on a stool with a black and red AR-15 style pistol with an extended magazine, and a Glock type black pistol with an extended magazine sitting on a counter directly behind him.



29. On May 16, 2022, ISAAC posted a series of photos of himself holding an AK-47 style pistol with an extended magazine on his Instagram Account. Individual rounds of ammunition are visible through the clear panel in the side of the magazine.





30. On May 19, 2022, ISAAC posted a series of photos to his Facebook Account depicting him with firearms. In one photo he is holding a Glock type pistol with an exposed gold barrel, and in a second photo he is posing with an AR-15 type pistol.



31. On May 30, 2022, ISAAC posted a photo of himself holding an AK-47 style pistol with an extended ammunition magazine and what appears to be a large stack of United States currency to his Instagram Account.



32. On August 15, 2022, ISAAC posted a series of photos in which he poses with eight different Glock type pistols to his Instagram Account. Two pistols are held in his right hand, while the remaining six are arranged on the floor in front of him. Two of these pistols appear to be loaded with 50-round drum magazines, the remaining six pistols all have extended magazines inserted in them. The pistol in the center of the first photo is surrounded by sixteen votive candles and a silver Glock Full-Auto “Switch” is clearly visible, affixed to the rear of the slide.



33. On August 15, 2022, in the same series of photos posted to the Instagram Account, ISAAC posted a video in which ISAAC is observed pretending to drink out of the Glock style pistol with the “switch” that was depicted in a related photo outlined with votive candles. The video is edited to hide the rear of the slide where the full-auto “switch” is likely present. Investigators believe this specific edit is in an attempt to hide the device. However, the device is visible in multiple other frames within the same video.



34. On August 17, 2022, ISAAC posted a video of himself to his Instagram Account that depicted him dancing in front of a mirror while brandishing an AK-47 style pistol with an extended magazine.



35. On August 30, 2022, ISAAC posted a series of photos with captions indicating ISAAC gave his friend, Tyjavian Hill, an AK-47 type pistol as a birthday gift. ISAAC and Tyjavian Hill then posed with multiple firearms while standing on a pool table. There were additional firearms, besides those held by the men, that were visible on the pool table. These photos were posted to ISAAC's Facebook Account and investigators believe they were taken inside ISAAC's residence.



36. On September 7, 2022, a third party posted a video on ISAAC's Facebook Account showing ISAAC holding and firing multiple firearms. While ISAAC wears a balaclava covering his face at most times during this video, he is still readily identifiable by his signature jewelry bearing his "Sleazy" moniker, his overall physique, and clothing. In one clip, ISAAC does not wear the balaclava and his face is partially visible while shooting a rifle.





37. The Facebook Account of the same third party that posted the video of ISAAC firing multiple firearms contained photos of ISAAC from the same date and event in which ISAAC is observed wearing the same clothing and jewelry. In these photos, ISAAC's face is not covered.





Firearm Seizure on October 19, 2022

38. On October 19, 2022, ATF personnel conducted an extensive surveillance of Joseph Rob ISAAC also known as “SleazyWorld-Go” and Charlton MURPHY as they traveled throughout Kansas City, Missouri; Kansas City, Kansas; and Parkville, Missouri. At the initiation of the surveillance, MURPHY was observed by ATF personnel removing an AK-47 style rifle from his vehicle and placing it in the front passenger side area of ISAAC’s vehicle while at 340 N. Coy Street, Kansas City, Kansas. ISAAC and MURPHY were then observed riding together in ISAAC’s 2021 Jeep Grand Cherokee “Track Hawk”, bearing a Kansas temporary license plate C993655 throughout the majority of the time that they were surveilled.

39. Surveillance crews followed ISAAC as he drove from Kansas City, Kansas into Kansas City, Missouri, and then to his residence in Parkville, Missouri without stopping. ISAAC’s residence is located at 6809 Prairie Lane, Parkville, Missouri, a location within the Western District of Missouri. Once at his residence, ISAAC parked his vehicle in the driveway. Surveillance crews and stationary surveillance observed ISAAC exit his vehicle and enter his residence. ISAAC was then observed exiting his residence carrying an unknown object to the

front passenger door of his vehicle where MURPHY was seated. ISAAC then walked across the street to his mother's residence at 6808 Prairie Lane, Parkville, Missouri while MURPHY remained in ISAAC's vehicle.

40. A short time later, ISAAC returned to his residence, 6809 Prairie Lane, Parkville, Missouri, briefly before reentering his vehicle. Once ISAAC was back in his vehicle, MURPHY exited the vehicle and went into ISAAC's residence. MURPHY exited the residence a short time later with a bottle of Gorilla Glue spray adhesive. After MURPHY returned to the vehicle, ISAAC drove out of the area, eventually returning to 340 North Coy Street, Kansas City, Kansas. During this time, MURPHY posted a video to his Instagram Account in which he was observed in the front passenger seat of ISAAC's vehicle holding a tan colored Glock pistol between his legs and an AK-47 style rifle standing upright on the floorboard next to his left leg.



41. At 340 North Coy Street, Kansas City, Kansas, a residence linked to ISAAC's girlfriend, ISAAC parked his vehicle in the parking lot for those townhome residences. Surveillance personnel observed ISAAC walking around his vehicle while holding both a black Glock-style pistol with an extended magazine as well as an AK47-style pistol commonly known as a "Draco." Investigators also observed several other associates of ISAAC and known gang

members from the SleazyWorld/Brotherland Gangs in the parking lot with ISAAC. The other individuals were also observed to be armed with various firearms.

42. After walking around with the firearms, ISAAC was observed placing them on the passenger side of his vehicle. ISAAC was also observed handing a red in color cellular phone to Charlton MURPHY. MURPHY then utilized the red cellular telephone to take digital photos and/or videos of ISAAC while he posed in front of the open front passenger side door of his vehicle. Due to the placement of the firearms in the passenger side of the vehicle and the location of ISAAC when the photos and/or videos were taken, investigators believe the photos and/or videos captured on the red cellular telephone will depict ISAAC and the firearms.

43. Due to ISAAC's open possession of firearms despite his status as a convicted felon, the presence of several armed gang members from the SleazyWorld/Brotherland Gangs, and the knowledge known to ATF personnel that the members of the gangs are associated with gun violence, drug sales, and illegally modified fully automatic firearms, investigators determined enforcement action was appropriate. ATF personnel contacted tactical officers of the Kansas City, Kansas Police Department Special Operations Unit. Upon arrival of tactical officers from the Kansas City, Kansas Police Department, ISAAC and his associates fled on foot inside the townhome residence located at 340 North Coy Street in an effort to elude detention by law enforcement.

44. The tactical officers attempted to ensure that there were no other parties who could cause harm to law enforcement personnel inside of ISAAC's "Track Hawk" and other vehicles parked in front of the townhome. An officer observed very heavy window tint on ISAAC's vehicle and utilized an iPhone camera in order to look inside the vehicle to complete the tactical clearing of the vehicle. The tactical clearing of vehicles in situations like what has been described is

standard practice in law enforcement and done to ensure that no persons who could cause harm to police personnel are present within a vehicle. The officer did not observe any individuals in the vehicle but did observe multiple AK-47 style firearms on the passenger side of ISAAC's vehicle where ISAAC had previously been observed posing for photos with MURPHY. The doors of ISAAC's vehicle were locked.

45. ISAAC was contacted by ATF personnel and tactical officers through the front door of 340 North Coy Street. ISAAC was informed that the firearms in his vehicle were going to be recovered. Investigators requested ISAAC unlock the doors of his vehicle to avoid damage to the vehicle, but ISAAC refused to unlock his vehicle. To recover the firearms, ATF personnel gained access by breaking the driver's side window.

46. Upon gaining access to ISAAC's vehicle, multiple firearms were discovered on the passenger side of the vehicle where ATF personnel observed ISAAC. The firearms included a AK-47 style rifle; two AK-47 style "Draco" pistols; and a black Glock pistol with a loaded extended magazine and an affixed "Glock switch" bearing serial number PEB668. Also, inside the vehicle, investigators discovered multiple rounds of .223 caliber ammunition, a new 30-round .223 caliber ammunition magazine in retail packaging for an AR-15 type rifle or pistol, torn retail packaging for a .40 caliber 22-round Glock pistol extended ammunition magazine, and torn retail packaging for a shoulder pistol holster. The tan Glock pistol observed in the video that MURPHY posted to Instagram was not located. The AK-47 style rifle observed in that video was located in the exact location it was observed in the video. Additionally, the can of Gorilla Glue spray adhesive was located on the floor of the front passenger seat. The Micro Draco pistol on the front

passenger seat was found to have fresh Gorilla Glue holding the front wooden foregrip onto the underside of the barrel.



47. The firearms located within ISAAC's vehicle were recovered by investigators as evidence. On October 20, 2022, the firearms were swabbed for DNA for comparison to ISAAC and MURPHY, both prohibited from possessing firearms under federal law.

48. The Glock pistol recovered from ISAAC's vehicle was sent to the ATF forensic laboratory and found to function in both a semi-automatic and fully automatic capacity making it fit within the federal definition of a machinegun.

49. Traces of the four recovered firearms show that the two Draco pistols and the Glock pistol with the affixed full-auto "Switch" were originally purchased by Treveon Hill and the AK-47 type rifle was originally purchased by Tyjavion Hill. The Hill brothers are known to be close associates of ISAAC.

50. After recovery of the firearms, investigators looked at the social media information to determine if there were photos or videos depicting ISAAC with the recovered firearms. In two

videos posted to his Instagram Account on May 7, 2022, ISAAC is observed driving a vehicle while holding an AK-47 type pistol with dark brown wood grips and a small-framed Glock pistol with an affixed Glock “switch” full-auto conversion device. The Glock pistol is consistent with the pistol recovered by law enforcement on October 19, 2022. The AK-47 type pistol is consistent with one that ISAAC posed with in multiple videos and photos taken both within his residence, 6809 Prairie Lane, Parkville, Missouri, and elsewhere.

51. In multiple frames of the May 7, 2022, Instagram video, a partial serial number for the Glock firearm is visible. On January 4, 2023, investigators sent this video to a United States Secret Service Forensic Video Analyst to see if the serial number could be digitally enhanced enough to read. It was the opinion of that analyst that the general alphanumeric characters of the partial serial number visible within the video was consistent with the Serial Number “PEB668,” the serial number of the firearm recovered from ISAAC’s vehicle on October 19, 2022. The analyst further stated that because the video was derived from Instagram, it was a compressed version of the original video and of lower resolution quality. The expert believes if the original video is obtained, it is more likely that the full serial number could be read in its entirety.

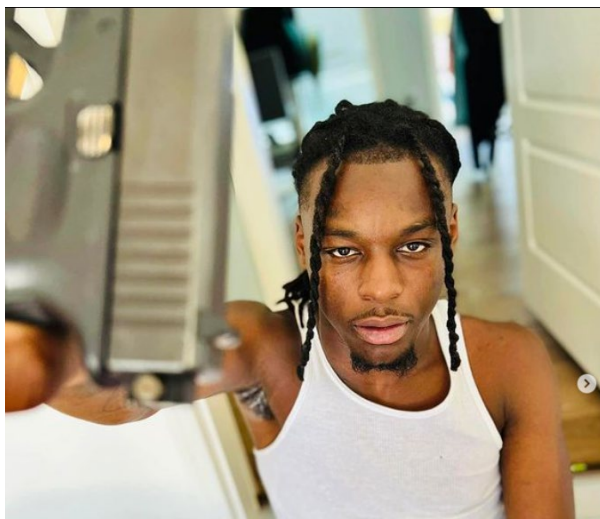
Charlton Murphy

52. In February 2022, Charlton MURPHY (DOB: 03/19/2001) was charged with two counts of Aggravated Robbery in Johnson County, Kansas District Court. MURPHY was granted pre-trial release, which included the use of an ankle GPS monitoring device. In December 2022, MURPHY cut off the GPS monitoring device. As a result, MURPHY currently has an active arrest warrant that was issued on December 7, 2022.

53. In September and October 2022, MURPHY reported to his Johnson County, Kansas pre-trial services officer that he lived with his sister at 6809 Prairie Lane, Parkville, Missouri. MURPHY's sister is, Tamerica Lewis, ISAAC's girlfriend.

54. Investigators last observed MURPHY at the 6809 Prairie Lane residence on January 4, 2023, with ISAAC.

55. A review of the Instagram account attributed to MURPHY revealed that on August 2, 2022, MURPHY posted a photo of himself posing with a Glock firearm with an affixed Glock "Switch" full-auto conversion device, which is consistent with a firearm often possessed by ISAAC. Investigators also believe the photo was taken while MURPHY was inside the garage of ISAAC's residence. As MURPHY has been under felony indictment since February 2022, it is likely that he received this firearm from ISAAC while under this indictment in violation of 18 U.S.C. § 922(n).



56. On September 10, 2022, MURPHY posted a photo of himself in the kitchen of the 6809 Prairie Lane, Parkville, Missouri. A tan Glock pistol with a holographic colored slide is visible on the counter behind him. This pistol is consistent with the one observed between his legs in the video MURPHY posted to Instagram on October 19, 2022, just prior to law

enforcement's intervention. In this photo, MURPHY's court mandated supervised release GPS monitor is also visible on his ankle.



Possession & Use of a Phone by ISAAC

57. As early as September 4, 2022, ISAAC began posting photos and videos on social media showing that he routinely carries a cellular telephone with a red case and affixed ID/credit card keeper. ISAAC also posts photos in which he has an additional cellular phone in a dark grey/black case.



58. The most recent photo on social media depicting ISAAC in possession of this red phone was posted on December 30, 2022.



59. During surveillance in the overnight hours of January 22, 2023, into January 23, 2023, investigators conducted surveillance of ISAAC at the Kansas City International Airport. Investigators observed ISAAC deboard a flight possessing and using a cellular telephone with a red case consistent with the phone seen in previous surveillance (October 19, 2022) and numerous social media posts. Investigators followed ISAAC from Kansas City International Airport to his residence at 6809 Prairie Lane, Parkville, Missouri.

Traffic Stop on January 6, 2023

60. On January 6, 2023, shortly after it departed ISAAC's residence, a vehicle operated by Tyjavion Hill was pulled over for a traffic violation by officers with the Parkville, Missouri Police Department. There were two passengers in the vehicle, Treveon Hill and Marshaun

Zachary. A record check of the vehicle revealed it was registered to ISAAC with an address of 304 North Coy Street, Kansas City, Kansas.

61. When the officer asked for the vehicle's insurance information, Tyjavion Hill opened the glovebox of the vehicle revealing the presence of two Glock pistols with extended magazines. The officer asked if there were additional weapons in the vehicle and was informed there was a third firearm in the backpack on the front passenger floorboard and a fourth on the floor in the rear passenger compartment. All occupants were removed from the vehicle and the firearms were secured. The driver, Tyjavion Hill, was arrested for an outstanding felony arrest warrant. Officers conducted an inventory of the vehicle before it was towed from the scene. The inventory revealed six empty firearm boxes, multiple firearm ammunition magazines, multiple boxes of ammunition, a black balaclava mask, black rubber gloves, and clear plastic baggies.

62. Officers recovered a Glock, Model 26, 9mm pistol; a Glock, Model 45, 9mm pistol; a Glock, Model 23, .40 caliber pistol; and a Zastava AK-47 pistol. The firearms were recovered by officers.

63. On January 10, 2023, investigators reviewed the firearms recovered in the traffic stop. Investigators immediately recognized the AK-47 pistol as appearing identical to the one in photos posted on the Facebook account of Tyjavian Hill on August 29, 2022. In this post, Hill stated he received this firearm from ISAAC for his birthday on this same date. Treveon Hill, Tyjavian Hill's brother, was the original purchaser of two of the pistols recovered from ISAAC's vehicle on October 19, 2022.



ADDITIONAL CELLULAR TELEPHONE INFORMATION

64. Affiant knows that digital media can be stored within the storage of multiple devices such as cellular phones, laptop computers, desktop computers, hard drives, USB digital storage drives, digital camera memory cards, cellular phone SIM cards, multiple forms of compact discs, and other similar devices.

65. Affiant also knows through training and experience that devices can be used to create content placed on social media, to include photos, videos, and music. Affiant knows that when filming a music video, sometimes multiple takes and camera angles are required. This leads to an abundance of content which can be edited to create a final product that is posted to social media websites. As such, it is likely that only a small portion of the photos, videos, or other content created with the devices is publicly posted. Therefore, the devices likely contain additional photos and/or videos constituting evidence of the **Target Offenses** that has not been captured by investigators through review of the publicly available content posted to social media websites or the content revealed through the social media search warrants.

66. Affiant also knows through training and experience that web-based social media platforms like Instagram and Facebook will often compress and resize uploaded photos and videos to a smaller size to save server space and increase download times for users. This compression leads to the intentional degradation of data in photos and videos resulting in smaller formats and a lower level of resolution detail than was originally created by the cellular phone or other digital device that originally created the photo or video. However, the digital device that created the photo and/or video will retain the original photo or video in its larger, non-compressed, and more detailed version unless deleted or offloaded to a different storage device by the user.

67. Affiant also knows that digital media can be stored indefinitely within cellular phones, laptop computers, desktop computers, hard drives, USB digital storage drives, digital camera memory cards, Cellular phone SIM cards, multiple forms of compact discs, and other similar devices. Additionally, even digital media files that have been deleted from the storage devices can at times still be recovered, restored, and viewed.

CONCLUSION

68. Based upon the foregoing information, investigators believe there is probable cause that ISAAC committed and continues to commit the **Target Offenses**.

69. Investigators also believe there is probable cause to believe the collection of ISAAC's DNA through buccal swabs would lead to additional evidence of the **Target Offenses**. The DNA sample obtained from ISAAC through the authority of this search warrant would be forwarded to the crime laboratory for forensic comparison to the DNA swabs of the firearms recovered from ISAAC's vehicle on October 19, 2022.

70. Investigators also believe there is probable cause to believe ISAAC's residence contains evidence of his previous and ongoing commission of the **Target Offenses**. There is

probable cause to believe the residence contains firearms, Glock “Switches,” ammunition, firearm magazines, and a cellular telephone in a red case (as previously described). Posts from social media accounts depict ISAAC and others, to include Tyjavian Hill and Charlton MURPHY, in possession of firearms and Glock “Switches,” in the residence on different occasions over a period of time. The consistent and open possession of firearms, to include Glock “Switches,” by ISAAC leads investigators to believe he is currently in possession of firearms despite his prohibited status. Furthermore, the cellular telephone in the red case that investigators have observed being used to document evidence of the **Target Offenses** was being used and in the possession of ISAAC immediately before he traveled to his residence in the early morning hours of January 23, 2023. Therefore, there is probable cause to believe that cellular telephone and the evidence it contains is currently located within the residence. Considering all of those facts, there is probable cause to believe ISAAC’s residence contains evidence of the **Target Offenses**.

FURTHER AFFIANT SAYETH NAUGHT.

Nicholas M. Horine

NICHOLAS HORINE

Task Force Officer

Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed to and sworn to before me

this 23rd
day of January 2023.

Sworn to by telephone
2:58 PM, Jan 23, 2023

Lajuana M. Counts

HONORABLE LAJUANA M. COUNTS

United States Magistrate Judge

Western District of Missouri

